

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Emergent Fidelity Technologies Ltd,

Debtor.¹

)
) Chapter 11
)
) Case No. 23-10149 (JTD)
)
) **RE: D.I. 56**
)

**CERTIFICATE OF NO OBJECTION REGARDING RETENTION AND
EMPLOYMENT OF MORGAN, LEWIS & BOCKIUS LLP AS ATTORNEYS
FOR THE EMERGENT DEBTOR EFFECTIVE AS OF THE PETITION DATE**

Jody C. Barillare as proposed counsel to the above-captioned debtor and debtor-in-possession (the “Emergent Debtor”) hereby certifies as follows:

1. On March 3, 2023, the Emergent Debtor filed its *Application for Entry of an Order Authorizing the Retention and Employment of Morgan, Lewis & Bockius LLP as Attorneys for the Debtor Effective as of the Petition Date* (the “Application”) [D.I. 56, Case No. 23-10149].
2. The Emergent Debtor attached a notice form to the Application, setting forth March 17, 2023 as the deadline for filing a response to the Application (the “Objection Deadline”) and April 12, 2023 as the hearing date (the “Notice Form”). *See* D.I. 56.
3. The Emergent Debtor served the Notice Form, the Application and exhibits attached thereto as reflected in the certificate of service filed at D.I. 57.
4. On April 6, 2023, after consultation with the United States Trustee, the Emergent Debtor filed and served a supplemental declaration which provides additional disclosures related to the Application. *See* D.I. 84.

¹ The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd, a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor’s principal place of business is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline. The Emergent Debtor received informal comments from certain parties-in-interest, including the United States Trustee (the “Informal Comments”); however, no other responsive pleading or objection has been filed with this Court on the docket of this chapter 11 case or the chapter 11 cases of FTX Trading Ltd. and its affiliated debtors, or served upon the Emergent Debtor or its proposed counsel.

6. Accordingly, the Emergent Debtor respectfully requests entry of a revised form of the proposed order (the “Revised Order”), attached hereto as **Exhibit A**, reflecting the agreed changes based on the Informal Comments received from the parties-in-interest. The United States Trustee has no objection to the form of Revised Order.

7. A redline copy of the Revised Order is attached hereto as **Exhibit B**, showing changes made from the proposed order attached to the Application.

[Signature page to follow]

Dated: April 6, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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*Proposed Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*